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21
22 **IN THE UNITED STATES DISTRICT COURT**
23 **FOR THE DISTRICT OF ARIZONA**

24 IN RE: Bard IVC Filters Products Liability
25 Litigation

26 No. MDL 15-02641-PHX-DGC

27 **SUPPLEMENTAL CITATION OF
28 AUTHORITY RE LAW OFFICES OF
BEN C. MARTIN AND MARTIN
BAUGHMAN'S MOTION TO
REDUCE AND EXEMPT CLIENT
RECOVERIES FROM COMMON
BENEFIT FEE AND EXPENSE
ASSESSMENT AND MEMORANDUM
OF LAW IN SUPPORT**

29 **(Sealed; Ex Parte)**

30 The *In re Bard IVC Filters Products Liability Litigation* Common Benefit Fees and
31 Costs Committee (“Committee”) advises the Court of supplemental authority applicable to
32 the Motion of Law Offices of Ben C. Martin and Martin Baughman to Reduce and Exempt
33 Client Recoveries from Common Benefit Fee and Expense Assessment and Memorandum
34 of Law in Support [Doc. 22144] (“Motion”).

1 On May 9, 2022, Judge Polster issued an Ongoing Common Benefit Order in *In re:*
2 *National Prescription Opiate Litigation*, Case No. 1:17-md-2804, N.D. Ohio, attached as
3 Exhibit A. The order relates to the ability of an MDL judge to assess different classes of
4 claimants and plaintiffs when common benefit work product is used, and is relevant to
5 the arguments made at pages 7-9 of the Motion.

6 RESPECTFULLY SUBMITTED this 19th day of May, 2022.

BEUS GILBERT MCGRODER PLLC

By:s/ Mark S. O'Connor

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CERTIFICATE OF SERVICE

I hereby certify that on May 19, 2022, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing. Additionally, a copy of the foregoing was emailed on the same date to:

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